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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re : Chapter 11  
:   
DELPHI CORPORATION, *et al.* : Case No. 05-44481 (ajg)  
:   
Debtor. : Jointly Administered  
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**NOTICE OF APPEARANCE,  
REQUEST FOR ADDITION TO MASTER SERVICE LIST,  
AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE**, that Security Plastics Division/NMC LLC (“Creditor”), by its attorneys, Pryor & Mandelup, L.L.P., hereby appears in the above-captioned Chapter 11 case, pursuant to section 1109(b) of Chapter 11, Title 11, United States Code, 11 U.S.C. §§ 101 *et. seq.*, as amended (the “Bankruptcy Code”), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

**PLEASE TAKE FURTHER NOTICE**, that Creditor, by its attorneys, Pryor & Mandelup, L.L.P., demands, pursuant to Sections 349 and 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2002, 3017, 4004, 4007 and 9007, that copies of all notices, statements, papers, and pleadings

given or filed in this case, be given and served upon them at the following address, facsimile, telephone numbers and email addresses:

Pryor & Mandelup, LLP  
675 Old Country Road  
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Email: [asm@pryormandelup.com](mailto:asm@pryormandelup.com) and [kar@pryormandelup.com](mailto:kar@pryormandelup.com)

**PLEASE TAKE FURTHER NOTICE**, that, pursuant to Paragraph “15(f)” of the “Case Management Order” entered October 8, 2005 in the above-captioned case, that Creditor, by its attorneys, Pryor & Mandelup, L.L.P., requests that Creditor, at the aforementioned address, be added to the Master Service List in this case.

**PLEASE TAKE FURTHER NOTICE**, that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Code and the Bankruptcy Rules specified above, but also includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, requests, complaints, demands, replies, answers, schedules of assets and liabilities and statements of affairs, operating reports, plan or plans of reorganization or liquidation, and disclosure statements, whether transmitted or conveyed by mail, courier service, telegraph, facsimile, telex, or otherwise, that affect the above-captioned debtor or its estate.

**PLEASE TAKE FURTHER NOTICE**, that neither this notice nor any subsequent appearance, pleading, claim or suit is intended to waive and shall not constitute a waiver of (i) Creditor’s right to have final orders in non-core matters entered only after *de novo* review by a District Court; (ii) Creditor’s right to a jury trial in any proceedings so triable herein, or in any case, controversy, or proceeding related hereto; (iii) Creditor’s right to request to have the reference

withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal;  
or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Creditor is or  
may be entitled to under agreements, documents or instruments, in law or equity, all of which rights,  
claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: Westbury, New York  
October 21, 2005

PRYOR & MANDELUP, LLP  
Attorneys for Security Plastics Division/NMC LLC

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All Parties Identified on the Master Service List Maintained by Debtor, a copy of which is annexed hereto